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8 Attorneys for Respondents
9 1955 CAPITAL FUND I GP LLC AND
10 1955 CAPITAL CHINA FUND GP LLC

11 [additional counsel appears on the signature page]

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 CHINA FORTUNE LAND DEVELOPMENT
16 and GLOBAL INDUSTRIAL INVESTMENT
17 LIMITED,

18 Petitioners,

v.

19 1955 CAPITAL FUND I GP LLC and 1955
20 CAPITAL CHINA FUND GP LLC,

21 Respondents.

22 Case No. 19-cv-07043-VC

23 **STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO PETITIONERS'
MOTION TO VACATE AND FOR
RELIEF FROM JUDGMENT**

24 Judge: Hon. Vince Chhabria

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28 STIPULATION AND [PROPOSED] ORDER TO
EXTEND TIME TO RESPOND TO MOTION TO
VACATE, CASE NO. 19-CV-07043-VC

1 Pursuant to Local Rules 6-1(b) and 6-2, Petitioners China Fortune Land Development
2 and Global Industrial Investment Limited (“Petitioners”) and Respondents 1955 Capital
3 Fund I GP LLC and 1955 Capital China Fund GP LLC (“Respondents”) (collectively, the
4 “Parties”), by and through their respective counsel hereby stipulate and agree as follows:

5 WHEREAS, Petitioners filed their Motion to Vacate and for Relief from Judgment
6 (“Motion”) on November 25, 2020 (Dkt. No. 84);

7 WHEREAS, Respondents have 14 days (or until December 9, 2020) to submit their
8 response to the Motion pursuant to L.R. 7-3(a);

9 WHEREAS, Petitioners have 7 days (or until December 16, 2020) to submit their
10 reply in support of the Motion pursuant to L.R. 7-3(c);

11 WHEREAS, the hearing on the Motion is scheduled for January 7, 2021 at 10:00
12 a.m.;

13 WHEREAS, the Parties have conferred and agree to extend the deadlines by two days
14 to account for the Thanksgiving holiday. This extension does not affect the scheduled
15 motion hearing; and

16 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties,
17 through their respective counsel of record and subject to Court approval, as follows:

- 18 • Respondents’ Response to the Motion to Vacate and for Relief from Judgment
19 will be due on December 11, 2020;
20 • Petitioners’ Reply in support of the Motion to Vacate and for Relief from
21 Judgment will be due on December 18, 2020; and
22 • The hearing on the Motion to Vacate and for Relief from Judgment will be on
23 January 7, 2021 at 10:00 a.m.

24 **IT IS SO STIPULATED.**

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1 Dated: December 3, 2020

ORRICK, HERRINGTON & SUTCLIFFE LLP

3 By: _____ *Russell P. Cohen*
4 RUSSELL P. COHEN

5 Attorneys for Respondents
6 1955 Capital Fund I GP LLC and
7 1955 Capital China Fund GP LLC

7 Dated: December 3, 2020

BAKER BOTTS LLP

9 By: _____ *Cheryl A. Cauley*
10 CHERYL A. CAULEY

11 Attorney for Petitioners
12 China Fortune Land Development and
13 Global Industrial Investment Limited

14 **FILER'S ATTESTATION**

15 Pursuant to Civil Local Rule 5-1(a), I attest that concurrence in the filing of this
16 document has been obtained from each of the other signatories hereto.

18 Dated: December 3, 2020

ORRICK, HERRINGTON & SUTCLIFFE LLP

20 By: _____ *Russell P. Cohen*
21 RUSSELL P. COHEN

22 Attorneys for Respondents
23 1955 Capital Fund I GP LLC and
24 1955 Capital China Fund GP LLC

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PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

6 Date: _____ 2020
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HONORABLE VINCE CHHABRIA
UNITED STATES DISTRICT JUDGE